



Compliance Certification

NR 445 Technical Advisory Group
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Objective

- ◆ To create a compliance certification process that would:
 - ◆ streamline implementation for new NR 445 standards & requirements;
 - ◆ reduce the need to issue construction permits;
 - ◆ eliminate the need to reopen operation permits;
 - ◆ maintain enforceability of rule



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Availability

- ◆ Any source that must undertake a compliance activity with the exception of those:
 - ◆ needing to demonstrate BACT or LAER
 - ◆ requesting a variance from LAER or RfC



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Timing

◆ Existing Sources

- ◆ Must complete compliance activity & submit certification no later than 36 months after effective date of the rule revision
- ◆ Applicable standards & recordkeeping will be rolled into operation permit upon permit renewal

◆ New/modified sources

- ◆ Must construct/operate in conformance with standards & submit certification by start up



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Content

- ◆ Certification would contain:
 - ◆ Statement that source is meeting standard(s)
 - ◆ which chemicals are emitted above threshold values
 - ◆ means of compliance
 - ◆ what records source will keep
- ◆ Records kept on-site must be of sufficient detail to support related compliance activity



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Examples of Compliance Activities & Related Records

Compliance Activity	Related Recordkeeping
Eliminate/substitute material	No additional recordkeeping
Limit material use	Records of use
Limit hours of use/operation	Records showing when & for how long a process is operated on an appropriate timeframe basis (e.g.; hourly, daily, monthly)
Dispersion modeling	Input & Output files
Testing	Test method, measurement, results
Controls	Pressure drops, temperatures, etc.

